

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$119,000 in funds in TD Ameritrade
account x3059,

Defendant

*
*
*
*
*
*
*
*

CIVIL NO. 23-cv-2380

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

Plaintiff, the United States of America, by its attorneys, Erek L. Barron, United States Attorney for the District of Maryland, and Stephanie Williamson and Aaron S.J. Zelinsky, Assistant United States Attorneys, brings this verified complaint for forfeiture in a civil action *in rem* and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

Nature of the Action

1. This is a civil forfeiture action *in rem* against funds that constitute or are derived from proceeds traceable to a violation of 18 U.S.C. §§ 666(a) and/or 1343, and therefore should be forfeited to the United States pursuant to 18 U.S.C. § 981.

The Defendant *In Rem*

2. The defendant property consists of \$119,000 in funds, including cash and securities, restrained in a TD Ameritrade account ending in x3059 held in the name of Roy McGrath (the “Defendant Property”), pursuant to a restraining order issued in Criminal Case DLB-21-399.

3. The Defendant Property is presently in the custody of TD Ameritrade. The account was opened when McGrath resided in the District of Maryland.

4. The United States brings this action *in rem* in its own right to forfeit all right, title and interest in the Defendant Property.

5. This forfeiture is based on, but not limited to, the evidence outlined in the attached Declaration of Federal Bureau of Investigation Special Agent Laura J. Steinbach, which is incorporated herein by reference.

Jurisdiction and Venue

6. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, over an action for forfeiture under 28 U.S.C. § 1355(a), and over this particular action under 18 U.S.C. § 981.

7. This Court has *in rem* jurisdiction over the Defendant Property under 28 U.S.C. § 1355(b). Upon the filing of this complaint, the plaintiff requests the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the Defendant Property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

8. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b) because the acts or omissions giving rise to the forfeiture of the Defendant Property occurred in this district.

Legal Basis for Forfeiture

9. The Defendant Property is subject to civil forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) because it constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. §§ 666(a) and/or 1343.

WHEREFORE, Plaintiff, the United States of America, prays that all persons who reasonably appear to be potential claimants with interests in the Defendant Property be cited to

appear herein and answer the Complaint; that the Defendant Property be forfeited and condemned to the United States of America; that upon Final Decree of Forfeiture, the United States dispose of the Defendant Property according to law; and that the plaintiff receive such other and further relief as this Court deems proper and just.

Respectfully submitted,

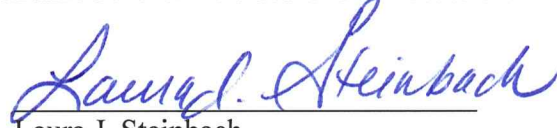
Erek L. Barron
United States Attorney

/s/
Stephanie Williamson
Aaron S.J. Zelinsky
Assistant United States Attorneys

VERIFICATION

I, Laura J. Steinbach, a Special Agent with the Federal Bureau of Investigation, declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the foregoing Verified Complaint for Forfeiture *In Rem* is based on reports and information known to me and/or furnished to me by other law enforcement agents and that everything contained therein is true and correct to the best of my knowledge and belief.

Date: 5/16/2023



Laura J. Steinbach
Special Agent
Federal Bureau of Investigation